

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MOTION TO MODIFY CONDITIONS OF RELEASE

The defendant, Frank Iacoboni (“Iacoboni”), respectfully requests that this Honorable Court modify his conditions of release to allow for out-of-state travel to Baltimore, Maryland from May 19 – 20, 2008.

Counsel for the government, Fred M. Wyshak, Jr., does not object to the allowance of this motion.

WHEREFORE, Iacoboni respectfully requests that the Court allow his motion.

Respectfully submitted,
FRANK IACABONI
By his attorney,

/s/ Thomas J. Butters
Thomas J. Butters
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Dated: May 6, 2008

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date, including:

Vangie Cuascut
Pretrial Services
Federal Courthouse
595 Main Street, Room 40
Worcester, MA 01608

/s/ Thomas J. Butters
Thomas J. Butters